

Plaintiffs' Exhibit C

FRANK LLP

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Page 6

Documents Concerning TSI's Relationship With Forster

The RFP broadly seek documents concerning TSI's business and financial relationship with Law Firms including Forster. (Req. Nos. 10 & 12).

Mr. Luke testified about the existence of several categories of such documents that have not been produced. Plaintiffs demand production of all of these documents as well as any remaining documents responsive to Plaintiffs' RFP:

- Documents concerning how TSI selects Law Firms such as Forster for inclusion in its nationwide "Attorney Network" of local counsel to which accounts are referred for litigation-based collection efforts for the benefit of Trusts. (Dep. Tr. 251:2–253:11).
- Documents concerning Forster's "market share"—a Law Firm's fixed percentage of TSI account referrals for litigation, within the jurisdiction in which it prosecutes state-court debt-collection lawsuits. (Dep. Tr. 255:18–258:9).
- Documents concerning TSI's annual performance-quality audits of Forster's work for the benefit of Trusts. (Dep. Tr. 278:12–279:12).
- Documents reflecting instances in which TSI called back an account that had been referred to a Law Firm such as Forster for litigation-based collection efforts for the benefit of Trusts, because TSI did not possess and/or could not obtain proof of indebtedness. (Dep. Tr. 249:16–250:20).
- Documents reflecting Law Firm requests to TSI for additional documents in connection with state-court consumer-defendants' demands for discovery in response to collection suits for benefit of the Trusts. (Dep. Tr. 290:15–293:13; 303:8–304:19). Such requested documents include, without limitation, "packets" of purported proof of indebtedness. (*Id.*).
- Documents reflecting instances in which members of the Affiant Team testified in state court in connection with such suits. (Dep. Tr. 159:7–16, 293:18–297:10). Such documents must reflect details including, without limitation, the costs of such appearances, and whether the outcome was dismissal by the state court.

Documents and Information Related to the CFPB's Investigation

The RFP demanded all documents pertaining to the Consumer Financial Protection Bureau's ("CFPB") investigation of TSI's production of false affidavits filed on behalf of the Trusts, as Plaintiffs' Complaint is heavily based on the CFPB's investigative findings as enumerated in the agency's September 18, 2017 filings against TSI and all fifteen of the National